

RECEIVED

UNITED STATES DISTRICT COURT JAN 20 PM 4:27
WESTERN DISTRICT OF TENNESSEE

Eastern (Jackson) DIVISION

Western (Memphis) DIVISION ✓ FEB 13, 2017 U.S. DISTRICT COURT

you x JAMES DEWAYNE GRIFFIN

Plaintiff,

No. _____

* vs. Delta Technical College
x Atty. Bruce Thieman
* Charles "Frankie" Ryals
Defendant.
x Ralph Fitzgerald

COMPLAINT

1. This action is brought for discrimination in employment pursuant to (*check only those that apply*):



Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (amended in 1972, 1978 and by the Civil Rights Act of 1991, Pub. L. No. 102-166) (race, color, gender, religion, national origin).

NOTE: In order to bring a suit in federal district court under Title VII, you must first obtain a right to sue letter from the Equal Employment Opportunity Commission.



Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 – 634 (amended in 1984, 1990, and by the Age Discrimination in Employment Amendments of 1986, Pub. L. No. 92-592, the Civil Rights Act of 1991, Pub. L. No. 102 -166)

NOTE: In order to bring a suit in federal district court under the Age Discrimination in Employment Act, you must first file charges with the Equal Employment Opportunity Commission.



Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 – 12117 (amended by the ADA Amendments Acts of 2008, Pub. L. No. 110-325 and the Civil Rights Act of 1991, Pub. L. No. 1102-166).

NOTE: In order to bring a suit in federal district court under the Americans with Disabilities Act, you must first obtain a right to sue letter from the Equal Employment Opportunity Commission.

JURISDICTION

2. Jurisdiction is specifically conferred upon this United States District Court by the aforementioned statutes, as well as 28 U.S.C. §§ 1331, 1343. Jurisdiction may also be appropriate under 42 U.S.C. §§ 1981, 1983 and 1985(3), as amended by the Civil Rights Act of 1991, Pub. L. No. 102-166, and any related claims under Tennessee law.

Current Address		<u>Mailing:</u> → 4532 Cottowood Road	<u>PARTIES</u>	
		Plaintiff resides at: 4532 Cottowood Road		
		Memphis, TN 38118		
PERMANENT:		STREET ADDRESS		MAILED TO:
3511 Seven Road Batesville, MS 38606		County: Panola	State	P.O. Box 301231 Memphis, TN 38132
		Zip Code		Telephone Number
4. Defendant(s) resides at, or its business is located at:				
301 SW Adams, Suite-700				
STREET ADDRESS		Peoria, IL		61602
County		City	State	Zip Code
Phone # (309)-676-1381				

NOTE: If more than one defendant, you must list the names, address of each additional defendant.

(2) Charles Frankie Rials, 434 Nesbit Rd.; Nesbit, MS 38651
Phone # (901)-268-6274

(3) Ralph Fitzgerald, 6550 D Interstate Blvd.,
Morn Lake, MS 38637

EMPLOYED

The address at which I sought employment or was employed by the defendant(s) is:

Delta Technical College, 4711 E. Holmes Rd.
Memphis, TN 38118

Employer

3
gD93

STREET ADDRESS

_____, _____, _____, _____
 County City State Zip Code

6. The discriminatory conduct of which I complain in this action includes (*check only those that apply*)



Failure to hire



Termination of my employment



Failure to promote



Failure to accommodate my disability



Unequal terms and conditions of my employment



Retaliation

Other acts(*specify*): RACE, SEX, COLOR

NOTE: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court.

7. It is my best recollection that the alleged discriminatory acts occurred on:

 Date(s)

8. I believe that the defendant(s) (*check one*):

By Employment Referral After References



is still committing these acts against me.

Both

is not still committing these acts against me.

I'm not employment anymore

9. Defendant(s) discriminated against me based on my:

(*check only those that apply and state the basis for the discrimination. For example, if religious discrimination is alleged, state your religion. If racial discrimination is alleged, state your race, etc.*)

Race BLACK /African-American

Color BROWN - DARK SKINNED

Gender/Sex MALE

Religion _____

National Origin _____

Disability _____

Age. If age is checked, answer the following:
 I was born in _____. At the time(s) defendant(s) discriminated against me.

I was [] more [] less than 40 years old. (check one)

NOTE: Only those grounds raised in the charge filed the Equal Employment Opportunity Commission can be considered by the federal district court.

10. The facts of my case are as follows:

Wrongful Termination, Retaliation, Race, Sex
Assist WITH My Right To Suit letter
Written Documentation
Mumilliate, Intimidate, and disrespect, fabricate
facts, Federal Motor Safety Violation asking me to
preform/do,
work with flat tire on tractor-trailer, Clean Restroom,
Cut grass (I'm allergic to grass - stated day one)
(Attach additional sheets as necessary)

NOTE: As additional support for your claim, you may attach to this complaint a copy of the

charge filed with the Equal Employment Opportunity Commission or the Tennessee Human Rights Commission.

11. It is my best recollection that I filed a charge with the Tennessee Human Rights Commission regarding defendant's alleged discriminatory conduct on: _____
12. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission regarding defendant's alleged discriminatory conduct on: Nov 8, 13 - Aug. 2014
Date

Only litigants alleging age discrimination must answer Question #13.

13. Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding defendant's alleged discriminatory conduct. (check one):

- 60 days or more have elapsed
- Less than 60 days have elapsed.

14. The Equal Employment Opportunity Commission (check one):

- has not issued a Right to Sue Letter.
- has issued a Right to Sue letter, which I received on Oct 25, 2016
Date

NOTE: This is the date you received the Right to Sue letter, not the date the Equal Employment Opportunity Commission issued the Right to Sue letter.

15. Attach a copy of the Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.

NOTE: You must attach a copy of the right to sue letter from the Equal Employment Opportunity Commission.

16. I would like to have my case tried by a jury:

- Yes
- No

WHEREFORE, plaintiff prays that the Court grant the following relief:

- direct that the Defendant employ Plaintiff, or
- direct that Defendant re-employ Plaintiff, or
- direct that Defendant promote Plaintiff, or
- order other equitable or injunctive relief as follows: Leave Open
FOR LATER
- direct that Defendant pay Plaintiff back pay in the amount of \$120,000⁰⁰
and interest on back pay: My RATE Each Year = \$40,000 @ 2013, 2014, 2015,
- direct that Defendant pay Plaintiff compensatory damages: Specify the 2016,
amount and basis for compensatory damages:
\$113,000⁰⁰

X James Delayne Huff
SIGNATURE OF PLAINTIFF

Date: Jan 19, 2016 (THURSDAY)

Address P.O. Box 301231

Phone Number Memphis, TN 38130

Phone Number 901-628-8805